

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ELIZABETH DE COSTER, *et al.*, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware
corporation,

Defendant.

Case No. 2:21-cv-00693-JHC

**STIPULATED MOTION AND ORDER
REGARDING CLASS
CERTIFICATION BRIEFING
SCHEDULE**

The parties, by and through their counsel, have agreed and stipulate as follows:

1. The Court previously granted the parties' request to extend the deadlines for the class certification briefing schedule by two months to allow parties time to discuss coordination of depositions of Amazon witnesses with plaintiffs in other related cases. The parties are still discussing coordination of the related cases and this matter, including the appropriate schedule for briefing class certification and scheduling attendant depositions.

2. To avoid motion practice while the parties discuss the appropriate deposition and briefing schedules, the parties agree to a one-month extension of the currently set class certification briefing deadlines.

3. The parties propose an interim modification of the schedule as follows:

	Current Schedule (ECF 108)	Proposed Schedule¹
Deadline for Plaintiffs to file motion for class certification	May 7, 2024	June 7, 2024
Opposition to Motion to Certify Class	August 7, 2024	September 9, 2024
Reply in Support of Motion to Certify Class	October 7, 2024	November 11, 2024
Hearing on Motion to Certify Class	To be set by the Court after briefing completed	To be set by the Court after briefing completed

4. This interim extension will allow time for the parties to work on a proposal for deposition and a class certification briefing schedules.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the Parties, through their undersigned counsel of record, and the Parties ask the Court to order, that:

1. The interim deadline for Plaintiffs to file their class certification motion is extended to June 7, 2024.

¹ The parties have adjusted the dates to avoid deadlines on weekends.

2. The interim deadline for Amazon to respond to Plaintiffs' motion is August 7, 2024.

3. The interim deadline for Plaintiffs' reply brief is October 7, 2024.

IT IS SO STIPULATED.

DATED: April 19, 2024

HAGENS BERMAN SOBOL SHAPIRO LLP

By /s/ Steve W. Berman

Steve W. Berman (WSBA No. 12536)

By /s/ Barbara A. Mahoney

Barbara A. Mahoney (WSBA No. 31845)

1301 Second Avenue, Suite 2000

Seattle, WA 98101

Telephone: (206) 623-7292

Facsimile: (206) 623-0594

E-mail: steve@hbsslaw.com

barbaram@hbsslaw.com

Anne F. Johnson (*pro hac vice*)

68 3rd Street, Suite 249

Brooklyn, NY 11231

Telephone: (718) 916-3520

E-mail: annej@hbsslaw.com

KELLER POSTMAN LLC

Zina G. Bash (*pro hac vice*)

111 Congress Avenue, Suite 500

Austin, TX, 78701

Telephone: (512) 690-0990

E-mail: zina.bash@kellerpostman.com

Jessica Beringer (*pro hac vice*)

Shane Kelly (*pro hac vice*)

150 North Riverside Plaza, Suite 4100

Chicago, Illinois 60606

Telephone: (312) 741-5220

E-mail: Jessica.Beringer@kellerpostman.com

E-mail: shane.kelly@kellerpostman.com

Daniel Backman (*pro hac vice*)

1101 Connecticut Avenue, N.W., Suite 1100

Washington, D.C., 20036

Telephone: 202-918-1123

E-mail: Daniel.Backman@kellerpostman.com

*Interim Co-Lead Counsel for Plaintiffs and the
proposed Class*

KELLER ROHRBACK L.L.P.

By: /s/ Derek W. Loeser

Derek W. Loeser (WSBA No. 24274)
1201 Third Avenue, Suite 3200
Seattle, WA 98101-3052
Telephone: (206) 623-1900
Facsimile: (206) 623-3384
E-mail: Dloeser@kellerrohrback.com

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By: /s/ Alicia Cobb

Alicia Cobb, WSBA # 48685
1109 First Avenue, Suite 210
Seattle, WA 98101
Telephone: (206) 905-7000
Email: aliciacobb@quinnemanuel.com

Steig D. Olson (*pro hac vice*)
David D. LeRay (*pro hac vice*)
Nic V. Siebert (*pro hac vice*)
Maxwell P. Deabler-Meadows (*pro hac vice*)
51 Madison Avenue, 22nd Floor
New York, NY 10010
Telephone: (212) 849-7000
Email: steigolson@quinnemanuel.com
Email: davidleray@quinnemanuel.com
Email: nicolassiebert@quinnemanuel.com
Email: maxmeadows@quinnemanuel.com

Adam B. Wolfson (*pro hac vice*)
865 South Figueroa Street, 10th Floor
Los Angeles, CA 90017-2543
Telephone: (213) 443-3000
Email: adamwolfson@quinnemanuel.com

*Interim Executive Committee for Plaintiffs and the
proposed Class*

DAVIS WRIGHT TREMAINE LLP

By: /s/ John A. Goldmark

John A. Goldmark, WSBA # 40980

MaryAnn Almeida, WSBA #49086

920 Fifth Avenue, Suite 3300

Seattle, WA 98104-1610

Telephone: (206) 622-3150

Facsimile: (206) 757-7700

E-mail: SteveRummage@dwt.com

E-mail: JohnGoldmark@dwt.com

E-mail: MaryAnnAlmeida@dwt.com

PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP

Karen L. Dunn (*pro hac vice*)

William A. Isaacson (*pro hac vice*)

Amy J. Mauser (*pro hac vice*)

Martha L. Goodman (*pro hac vice*)

Kyle Smith (*pro hac vice*)

2001 K Street, NW

Washington, D.C. 20006-1047

Telephone: (202) 223-7300

Facsimile: (202) 223-7420

E-mail: kdunn@paulweiss.com

E-mail: wisaacson@paulweiss.com

E-mail: amauser@paulweiss.com

E-mail: mgoodman@paulweiss.com

E-mail: ksmith@paulweiss.com


Attorneys for Defendant Amazon.com, Inc.

ORDER

Pursuant to stipulation, the Court ORDERS as follows:

1. The interim deadline for Plaintiffs to file their class certification motion is extended to June 7, 2024.
2. The interim deadline for Amazon to respond to Plaintiffs' motion is September 9, 2024.
3. The interim deadline for Plaintiffs' reply brief is November 11, 2024.
4. The Court assumes that the dates in paragraphs 2 and 3 above, just above counsel's signature blocks, are typographical errors.

Dated: April 22, 2024.



John H. Chun
United States District Judge